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OCT. 2 1989

Federal Communications Commission
Office of the Secretary

Re: Request by A. C. Nielsen to Transmit Automated
Measurement of Lineups (AMOL) information on Line 22 of
the NTSC Television Service/DA 89-1060

Dear Ms. Searcy:

September 29, 1989

Attached for filing with the Commission please find an original and four (4) copies of CBS's Reply Comments in the above-referenced proceeding.

If you have any questions concerning this filing, please contact the undersigned at the above number.

Very truly yours,

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Before the
Federal Communications Commission
WASHINGTON, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In Re)
Request by A. C. Nielsen to)
Transmit Automated Measurement) DA 89-1060
of Lineups (AMOL) information)
on Line 22 of the NTSC)
Television Service)

REPLY COMMENTS OF CBS INC.

CBS Inc. ("CBS") submits these reply comments in general support of the positions of several commenters, including the National Association of Broadcasters ("NAB") and the Public Broadcasting Service ("PBS"), filed in the instant proceeding, in opposition to A. C. Nielsen's request for special temporary authority to transmit AMOL information on Line 22 of the active picture area. Both the NAB and PBS urge that the Commission not authorize any further utilization of Line 22 of the active picture area for any purpose, except "video broadcast service, at least where the originator is not the" station licensee, PBS Comments, ¶12. For the following reasons, CBS strongly supports this point of view.

DISCUSSION

Nielsen argues that because most television receivers overscan the picture area, inclusion of AMOL information in Line 22 of the active picture area will not degrade the

picture received by viewers. CBS submits that Nielsen is incorrect.

1. Transmission of Data on Line 22 of the Active Video Can Degrade Reception of NTSC Receivers and Video Recorders.

Although, in general, the practice of many receiver manufacturers has been to overscan the picture tube by as much as 5% (2.5% top and 2.5% bottom), not all receivers are designed to have this amount of overscan. Moreover, many receivers cannot and do not maintain this amount of overscan as they age. Additionally, under low power line conditions, such as those that occur during brown-outs, the raster size could shrink, thus reducing the total amount of overscan. At such times, information on Line 22 would be displayed on the screen.

Further, large screen projection systems do not always use vertical overscan, so that all of the active picture is visible on the screen. Since the popularity of such sets is increasing, the number of receivers in use which would display degraded video if Nielsen is permitted to transmit AMOL on Line 22 can only grow.

Receiver manufacturers are continually introducing new features in high-end receivers. Because these new features are not likely to take into account an active picture area

less than that specified in the Commission's regulations, viewers using the most expensive sets may be forced to view a degraded picture. For example, sets with more stable horizontal and vertical sweep circuits than now generally available do not employ overscan -- owners of such sets will view Line 22. Sets which have picture-in-picture use all of the active lines. Since the "inserted" picture uses only selected lines from the transmitted signal, nonprogram signals on Line 22 within the inserted picture can have a greater negative impact on the viewer than when they are part of a fully-scanned picture.

In some receivers the scanning system and the video processing electronics require a number of lines to establish their proper operating conditions. This is especially true when receiving a signal recorded on a VCR. The presence of a signal that does not have the same characteristics as the rest of the picture could result in visible instability at the top of the picture.

2. Transmission of Data on Line 22 of the Active Video Can Adversely Affect the Development of an NTSC Compatible Advanced Television System.

As the Commission is aware, a significant effort is underway within the government and the private sector to develop a new, higher performance Advanced Television (ATV) system. A variety of approaches to ATV have been proposed. Some of

the proposals include compatibility with the current NTSC system and involve changes in the active picture area to provide space for additional picture information. Authorizations to use portions of the NTSC active picture area for nonprogram information could negatively impact as many as half of the proposals now under serious consideration. CBS believes the Commission should not further authorize use of Line 22 until it has had a reasonable opportunity to consult with the FCC Advisory Committee on Advanced Television Service to determine what, if any, adverse impact insertion of nonprogram matter into the active picture area would have on the issue of compatibility.

CONCLUSION

Thus far, at least four different companies have requested permission to use Line 22 of the active picture area to broadcast nonprogram material^{1/} and there are indications that more such requests may be in the

1/ The Commission has authorized Telescan, Inc., VidCode, Inc., Ad Audit and Republic/Airtrax to transmit nonprogram information in Line 22 of the active picture area. See, Reply to Opposition to Request in the matter of Request of A. C. Nielsen Company for Permissive Use of Line 22 of the Active Portion of the Television Video Signal, filed with the Commission by A. C. Nielsen Company, dated August 21, 1989, page 9.

offing.^{2/} It is conceivable that such requesters may look to other lines in the active picture area.^{3/} Use of other lines would increase the likelihood of the picture degradation and compatibility issues discussed above. CBS believes that the Commission should not permit any further use of the active picture area that will result in a degraded picture for even a small group of viewers. Therefore, CBS joins with the NAB in requesting that the Commission commence an inquiry to look into the entire question of use of the active picture area for nonprogram signals rather than continuing on a case-by-case basis.

Respectfully submitted,
CBS Inc.

By


Eleanor S. Applewhaite

By


Michael Rose

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September 29, 1989

2/ See, e.g., Comments of Arbitron filed with the Commission in the instant proceeding.

3/ Indeed, since there is a question whether other users could coexist on Line 22 with Nielsen, it is not unlikely that one or more of the companies now experimenting with Line 22 transmission might seek such authority.